

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: JOHNSON & JOHNSON
TALCUM POWDER PRODUCTS
MARKETING, SALES PRACTICES
AND PRODUCTS LIABILITY LITIGATION

MDL No. 16-2738 (FLW) (LHG)

This document relates to:
Susan Talvacchio v. Johnson & Johnson, et al.
Case No. 3:18-cv-05534-FLW-LHG

**AMENDED NOTICE TO TAKE
VIDEOCONFERENCE TRIAL PRESERVATION
DEPOSITION**

PLEASE TAKE NOTICE that pursuant to Rule 30 of the Federal Rules of Civil Procedure, and pursuant to the MDL *In Extremis* Deposition Protocol dated January 23, 2017, the videoconference deposition of Plaintiff, **Susan Talvacchio**, will be taken before a person authorized to administer the oath. As per agreement of all parties, the oath will be administered over videoconference and the identity of the witness stipulated on the record. This videoconference deposition will be recorded for use at trial and counsel are specifically informed that Plaintiff's health is declining such that she may not be available or capable to attend trial; therefore, this deposition is intended to preserve her testimony for use before the jury. The taking of said deposition may be adjourned from day to day until completed.

DATE & TIME OF DEPOSITION: **August 21, 2020; 11:00 a.m. EDT**

LOCATION: **Via Video Conference (link to be provided to Counsel prior to deposition)**

COURT REPORTER: **Golkow Litigation Services
One Liberty Place, Suite 5150
Philadelphia, PA 19103
(877) 370-3377**

Dated: August 17, 2020

Respectfully submitted,

PORTER & MALOUF, P.A.

By: /s/ Laurel Li Harris
Laurel Li Harris, MSB No. 104078
PORTER & MALOUF, P.A.
Post Office Box 12768
Jackson, Mississippi 39236-2768
Telephone: (601) 957-1173
Facsimile: (601) 957-7366

Attorney for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on August 17, 2020, a copy of the foregoing Amended Notice of Deposition was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's system.

/s/ Laurel Li Harris
LAUREL LI HARRIS

Attorney for Plaintiff